

FMC Corporation

Transmitted Via email

April 18, 2013

Mr. Greg Weigel
On Scene Coordinator
Emergency Response Unit
Office of Environmental Cleanup
U. S. Environmental Protection Agency
Region 10
1435 North Orchard Street
Boise, Idaho 83706

Re: EPA Unilateral Administrative Order (UAO) for Removal Action
CERCLA Docket No. CERCLA 10-2010-0170
RCRA Ponds 16S and 18A Interim Work Plans for Gas Extraction and Treatment

Dear Mr. Weigel,

EPA's letter of April 16, 2013, over your signature, approved FMC's March 8, 2013 Readily Implementable Interim Work Plans (IWPs) for Gas Extraction at RCRA Ponds 16S and 18A, with the condition that the cessation of gas extraction at particular pond would be preceded by measurements at all stand pipes associated with that pond for two consecutive months. FMC will make this revision in the IWPs for Ponds 16S and 18A that will be submitted within 30 days.

EPA's April 16, 2013 letter also directed FMC to commence implementation of the approved Interim Work Plans for Pond 16S and Pond 18A within 48 hours of receipt. This letter serves to notify you that start up of gas extraction as described in the approved Interim Work Plans commenced at approximately 10 a.m. MDT today without issue.

Also, be advised that the phosphine concentrations in perimeter pipe measurements within Ponds 16S and 18A included in the EPA letter were those I had received verbally from the field and provided to you via telephone. The final calculated source gas concentration, the average of the three readings with the final discharge flow coefficient, taken from each perimeter pipe (as per the monitoring procedure) are slightly revised as follows: Pond 18A east perimeter stand pipe 12,710 ppm (measured April 15) and Pond 16S north perimeter standpipe 12,609 ppm (measured April 16). The other stand pipes were significantly lower and all results will be included in the April monthly report.



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Additionally, as we had previously discussed, with the agency's direction to commence gas extraction at Pond 16S and Pond 18A, the Phosphine Assessment Study, which was primarily designed to evaluate the rebound of phosphine concentrations at Ponds 16S and 18A and to develop triggers for gas extraction, is now moot as gas extraction has now recommenced. FMC will prepare the Final Update to the RCRA Pond Phosphine Assessment Study Report Study that will function as the final RCRA Pond Phosphine Assessment Study Report and will include tabulated data, graphical presentation and evaluations of the cumulative monitoring data as well as the relevant FMC responses to *EPA Draft Comments* related to the Phosphine Assessment Study/ Report, as recommended in the January 25, 2013 Technical Memorandum - Fourth Quarter 2012 Update for Ponds 16S and 18A – RCRA Pond Phosphine Assessment Study. FMC will submit this Final Update by May 20, 2013.

Lastly, this letter also affirms that FMC is continuing to conduct air monitoring pursuant to the approved Air Monitoring Plan consistent with the direction in EPA's February 21, 2013 letter.

If you have any questions, please do not hesitate to contact me at 215/299-6700.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Barbara Ritchie', with a stylized, flowing script.

Barbara Ritchie
Associate Director, Environment
FMC Corporation